

Daniel B. Olmos (CA SBN 235319)
NOLAN BARTON & OLMOS LLP
600 University Avenue
Palo Alto, CA 94301
Tel. (650) 326-2980
Fax (650) 326-9704
dolmos@nbo.law

Counsel for Defendant
Jizhong Chen

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

UNITED STATES,

Plaintiff,

vs.

JIZHONG CHEN,

Defendant.

Case No. CR 19-00056 EJD

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE STATUS CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant United States Attorney Marissa Harris, and Defendant Jizhong Chen, through his attorney Daniel Olmos, that the status hearing in this matter be continued from November 8, 2021, to January 31, 2022.

This is a complex case with voluminous discovery, and the government has recently informed the defense that it intends to produce additional discovery which the defense will need time to review. Further, the defense intends to file a subpoena duces tecum pursuant to Federal Rule of Criminal Procedure 17(c) this month.

The parties agree that the time between November 8, 2021, and January 31, 2022, should be excluded from calculations under the Speedy Trial Act, which excludes delay when the interests of

1 justice in allowing for the effective preparation of the defense outweigh the best interest of the public
2 and the defendant in a speedy trial, taking into account the exercise of due diligence. 18 U.S.C. §§
3 3161(h)(7)(A) and (B)(iv).

4 For the foregoing reasons, the parties stipulate to continue the status conference to January
5 31, 2022.
6

7 IT IS SO STIPULATED

8 Dated: November 3, 2021

NOLAN BARTON & OLMOS LLP

9 /S/ Daniel B. Olmos

10 Daniel B. Olmos

11 Attorney for Defendant Jizhong Chen
12
13

14 Dated: November 3, 2021

Stephanie Hinds, Acting United States Attorney

15 /S/ Marissa Harris

16 By: Marissa Harris

17 Assistant United States Attorney
18
19
20
21
22
23
24
25
26
27
28

1
2
3 UNITED STATES DISTRICT COURT
4 FOR THE NORTHERN DISTRICT OF CALIFORNIA
5 SAN JOSE DIVISION
6

7
8 UNITED STATES,

9 Plaintiff,

10 v.

11 JIZHONG CHEN,

12 Defendant.
13
14

Case No. CR 19-00056 EJD

~~[PROPOSED]~~ ORDER TO CONTINUE
STATUS CONFERENCE

15
16 GOOD CAUSE APPEARING, it is hereby ordered that the status conference currently
17 scheduled for November 8, 2021, be continued to January 31, 2022, at 1:30 p.m. Based upon the
18 representation of counsel and for good cause shown, the Court also finds that the time between
19 November 8, 2021, through and including January 31, 2022, shall be excluded from calculations
20 under the Speedy Trial Act. The interests of justice in allowing for the effective preparation of the
21 defense and continuity of counsel outweigh the best interest of the public and the defendant in a
22 speedy trial, taking into account the exercise of due diligence. 18 U.S.C. §§ 3161(h)(7)(A) and
23 (B)(iv).
24

25 Dated: 11/4/2021



26 The Hon. Edward J. Davila
27 United States District Judge
28